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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CINDY COLLEY, an individual,

Plaintiff,

v.

SNAPMEDTECH, INC. DBA
SNAPNURSE, a corporation, and DOES 1-
10, inclusive,

Defendants.

No. 22-cv-03884-HSG

STIPULATION TO EXTEND DEADLINE
TO AMEND PLEADINGS;
DECLARATION OF BRUCE HIGHMAN
IN SUPPORT OF STIPULATION; ORDER

The parties hereto, by and through their respective attorneys, hereby stipulate to continuing the deadline for filing a motion to amend the complaint from December 16, 2022, to December 23, 2022, for the reasons set forth in the Declaration of Bruce Highman below.

DATED: December 15, 2022

/s/ Bruce J. Highman
Bruce J. Highman
Highman & Highman
Attorneys for Plaintiff

DATED: December 15, 2022

/s/ Lonnie D. Giamela
Lonnie D. Giamela
Fisher & Phillips LLP
Attorneys for Defendant
SnapMedTech, Inc. dba SnapNurse

DECLARATION OF BRUCE HIGHMAN

I, Bruce Highman, declare:

Stipulation to Extend Deadline to Amend Pleadings; Declaration; Order - No. 22-cv-03884-HSG

1. I am the attorney of record for plaintiff Cindy Colley.

2. This case settled in principle at a mediation on December 12, 2022, contingent on the parties working out all the terms of a written settlement agreement and signing it. In the unlikely event the parties are unable to work out all the language of a written settlement agreement, I plan to file a motion for leave to file a third amended complaint. The Court's October 20, 2022 Scheduling Order (Dkt. 32) set December 16, 2022, as the deadline for amending the pleadings. The parties ask that this deadline be extended one week to December 23, 2022 because I believe that will allow the parties enough time to work out all the language of a written settlement agreement which will in turn allow me to avoid spending attorney time drafting the motion to amend

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on December 14, 2022.

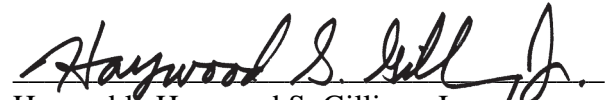
/s/ Bruce J. Highman

Bruce J. Highman

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 12/15/2022


Honorable Haywood S. Gilliam, Jr.
United States District Judge